

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MEETRIX IP, LLC,

Plaintiff,

v.

ZOHO CORPORATION

Defendant.

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Civil Action No. 1:22-cv-588-LY

**JOINT MOTION ON AMENDMENT OF PLEADING AND TO EXTEND CASE
MANAGEMENT DEADLINES**

Plaintiff Meetrix IP, LLC (“Plaintiff”) and Defendant Zoho Corporation (“Defendant”) (collectively, “the parties”) hereby jointly provide notice that the parties have stipulated to Plaintiff’s filing of the attached proposed Second Amended Complaint (*see* Exhibit A (“SAC”)), dependent upon extension of the case management deadlines by approximately 30 days.

On January 17, 2023, Plaintiff notified Defendant that it would be serving infringement contentions for U.S. Patent No. 8,477,778 (the “’778 patent”), a patent not previously asserted in this case, which Plaintiff would seek to add to its pleading. Zoho agreed to allow the SAC, so long as the case management deadlines could be extended by approximately 30 days and Zoho’s consent to allow amendment to add the ’778 patent would not prejudice Zoho on its motion to stay pending *inter partes* review of the four patents-in-suit.

Therefore, subject to the Court’s approval, the parties respectfully request the Court enter the attached proposed order permitting the filing of the proposed SAC and extending the case management deadlines as follows:

| Current Deadline | Proposed Deadline | Event |
|-------------------------------------|--|---------------------------------------|
| Fri., March 3, 2023 | Fri., April 7, 2023 | Disclosure: Invalidity Contentions |
| Fri., March 17, 2023 | Mon., April 17, 2023 | Identify Claims Terms to Be Construed |
| Fri., March 31, 2023 | Mon., May 1, 2023 | Joint Claim Construction Statement |
| Fri., April 21, 2023 | Mon., May 22, 2023 | Close of Claim Construction Discovery |
| Fri., May 5, 2023 | Mon., June 5, 2023 | Opening Claim Construction Brief |
| Fri., May 19, 2023 | Mon., June 19, 2023 | Reply Claim Construction Brief |
| Wed., May 31, 2023 @ 9:30am | Wed., June 28, 2023 @ 9:30am (or otherwise scheduled by the Court) | Tutorial |
| Wed., May 31, 2023 (after tutorial) | Wed., June 28, 2023 (or otherwise scheduled by the Court) | <i>Markman</i> Hearing |

Dated: February 24, 2023

Respectfully submitted,

/s/ Andrew G. DiNovo

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing is being served on the counsel of record via the CM/ECF system on February 24, 2023.

/s/ Ryan J. Marton